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July 15, 2004

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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Re: South Canaan Cellular Communications Company, LP
CC Docket No. 94-102
E911 Phase II Interim Implementation Report

Federal Communications Commission
Office of Secretary

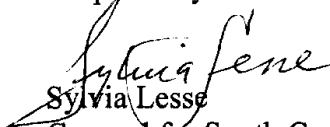
Dear Ms Dortch:

Pursuant to the Commission's Order to Stay,¹ South Canaan Cellular Communications Company, LP ("South Canaan") hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring the company's progress in deploying Phase II E911 technology.

South Canaan reiterates its request for waiver of Section 20.18(d) of the Commission's Rules (filed August 1, 2003). As indicated by the additional information provided herein, the public interest will be served by grant of the requested relief.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,



Sylvia Lesse
Counsel for South Canaan
Cellular Communications Company, LP

Enclosure

cc: John Muleta, Chief, Wireless Telecommunications Bureau
David Solomon, Chief, Enforcement Bureau
D'wana Terry, Chief, Public Safety & Critical Infrastructure Division
Eugenie Barton, Public Safety & Critical Infrastructure Division
Best Copy & Printing, Inc.
Mr. Bernie Swartwood, Pike County Communications

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¹ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

**SOUTH CANAAN CELLULAR COMMUNICATIONS COMPANY, LP.
E911 PHASE II INTERIM IMPLEMENTATION REPORT
FOR TIER III CARRIERS
Second Quarter, 2004**

South Canaan Cellular Communications Company, L.P. ("South Canaan" or "Company"), pursuant to the Commission's Order to Stay,¹ hereby provides an interim report to assist the Commission in monitoring South Canaan's progress in deploying Phase II E911 technology.²

I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

South Canaan's status with respect to Phase I and Phase II requests from PSAPs remains unchanged. South Canaan has received a valid Phase I request from Pike County and provides Phase I service to this county. South Canaan has also received a valid Phase II request from Pike County. The company has not received a Phase I or a Phase II request from the other county it serves, Wayne County.

II. The carrier's specific technology choice:

The Company continues to report that a network-based Phase II solution is not economically or technically feasible and that it has no alternative but to convert its analog system to a CDMA network that supports a handset-based solution.

III. Status on ordering and/or installing necessary network equipment:

As previously reported, the Company has purchased and installed upgrades to its Lucent switch so that it will now support digital signals.³ The Company reports that it has completed the digital conversion of its second cell site. The Company continues to remain on schedule to overlay its existing analog service with CDMA service by the end of 2004.

In anticipation of completion of the conversion of its network to CDMA, South Canaan has initiated the development of a subscriber educational campaign to encourage analog customers to transition to CDMA E911-Phase II-capable phones. Through these efforts, the Company anticipates that most of its customers will have migrated to CDMA E911-Phase II -

¹ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

² On August 1, 2003, South Canaan requested a limited and temporary waiver of the Commission's Phase II obligations ("Petition") and filed an E911 Phase II Interim Report for Tier III Carriers ("First Report"). In its Petition, South Canaan committed to providing quarterly progress reports. On November 10, 2003, South Canaan supplemented the Petition with updated information to further substantiate its request. See Supplement to Petition for Waiver of Section 20.18 of the Commission's Rules, CC Docket No. 94-102, filed Nov. 10, 2003 ("Supplement"). The Company filed progress reports on January 15 and April 15, 2004. The instant report serves as the Company's fourth quarterly progress report.

³ See Supplement at 2.

capable phones by the end of 2007. South Canaan hereby provides further details regarding this campaign:

1. Continuation of on-going efforts to transition customers from analog to digital.
South Canaan has introduced two additional tri-mode phones, the Kyocera S-14 ("Flip") and SE-44 ("Slider") to augment its offerings of the Motorola 120E and V60 phones. The penetration rate of the four E911-Phase II-capable phones (both new customers and upgrade transactions for existing customers) now stands at approximately 25%, up from the 9% level reported in April, 2004.⁴
2. Marketing Campaign
After the CDMA system has been fully deployed in the beginning of 2005, the Company plans to initiate an aggressive marketing campaign targeting remaining analog customers with billing inserts and print advertising. The marketing efforts would emphasize that location information will not be available to emergency service providers unless the customers transition to CDMA E911-Phase II-capable phones. Customers that still have analog-only handsets will also be specifically targeted regarding the additional benefits of digital service.
3. Incentives to Convert to CDMA E911 Phase II-Capable Phones
Consideration is also being given to providing a rebate or other benefit to customers who turn in their analog or TDMA handset and purchase a CDMA phone. The Company plans to discontinue sales of analog phones to the general public once the CDMA network is fully deployed and tested. A new product, "Signal Reach," which boosts the signal of low-wattage digital phones has been introduced. The Company plans to substitute this product for the popular 3-watt analog phones it has been selling to those subscribers who require a higher wattage phone to obtain a signal.

IV. Information Regarding Availability of E911-Phase II-Capable Handsets

As reported above, South Canaan has added an additional E911-Phase II-capable handset to its stock. South Canaan anticipates that it will continually incorporate additional E911-Phase II-capable models into its inventory as it approaches the time when it will begin to actively market its CDMA system.

V. The estimated date on which Phase II service will first be available in the carrier's network:

South Canaan continues to report that the anticipated date that it will begin selling and activating E911-Phase II-capable CDMA is January 1, 2005. Prior to the January 1, 2005 benchmark, South Canaan will have installed the necessary hardware and software in its CDMA network to provide Phase II service from its handset-based solution.

⁴ Although these dual- and tri-mode E911-Phase II-capable phones are being marketed, South Canaan continues to maintain that the public interest is better served by awaiting full system deployment before aggressively marketing CDMA E911-Phase II-capable handsets to subscribers. See Petition at 7 ("requiring sales of CDMA handsets before full system testing and deployment would result in customer dissatisfaction, as well as confusion as to when and where digital service is available").

DECLARATION OF CAROLYN C. COPP

I, Carolyn C. Copp, President of SCCI, LLC, the General Partner of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "E911 Phase II Interim Implementation Report for Tier III carriers, Secpmd Quarter, 2004" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

7/14/2004

Date

Carolyn C. Copp

Carolyn C. Copp